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Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re ) Case No. 16-30406-rld11  
)  
SeaPort Airlines, Inc., ) DEBTOR'S MOTION TO LIMIT NOTICE OF  
) INTENT TO SELL CERTAIN AIRPLANE PARTS  
) LOCATED IN JUNEAU, ALASKA  
Debtor-in-Possession.)

Debtor moves the court for an order limiting notice of the Debtor's Notice of Intent to Sell Certain Airplane Parts Free and Clear of Liens to the 20 largest unsecured creditors, members of the Unsecured Creditors Committee, all secured creditors; all governmental entity creditors and those parties who have requested special notice.

In support of this motion, Debtor respectfully represents:

1. There are approximately 600 creditors in the case and sending notice to all such creditors is not necessary and would be unduly expensive;

2. The Unsecured Creditors Committee and the United States Trustee do not oppose the Debtor's motion to limit notice as requested herein;

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3. The terms of the sale, as detailed in the Notice of Intent to Sell Certain Airplane Parts Located in Juneau, Alaska, provide the Court and the creditors with sufficient information as to the reasonableness of the sale price.

Respectfully submitted;

VANDEN BOS & CHAPMAN, LLP

By: /s/Robert J Vanden Bos

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Of Attorneys for Debtor-in-Possession

CERTIFICATE - TRUE COPY

DATE: May 19, 2016

DOCUMENT: DEBTOR'S MOTION TO LIMIT NOTICE OF INTENT TO SELL  
CERTAIN AIRPLANE PARTS LOCATED IN JUNEAU, ALASKA

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

SeaPort Airlines, Inc.  
Attn: Timothy Sieber  
816 SW First Avenue  
Portland, Oregon 97204

Michael J. Edelman  
VEDDER PRICE  
1633 Broadway, 47th Floor  
New York, New York 10019

Dan McAllister  
Treasurer-Tax Collector  
Attention: Bankruptcy Desk  
1600 Pacific Highway, Room 162  
San Diego, California 92101

Franklin C. Adams  
POB 1028  
Riverside, CA 92502-1028

Tulare County Tax Collector  
Attn Jorge Garcia  
Deputy Tax Collector  
221 S Mooney Blvd Rm 104-E  
Visalia, CA 93291-4593

Mark J. Wolfson  
100 N Tampa St #2700  
Tampa, FL 33602

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: May 19, 2016

VANDEN BOS & CHAPMAN, LLP

By: /s/Douglas R. Ricks for Robert J Vanden Bos  
Robert J Vanden Bos, OSB #78100  
Douglas R. Ricks, OSB #044026  
Christopher N. Coyle, OSB #07350  
Of Attorneys for Debtor-in-Possession